

# UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America )

v. )

Case No. B-17-696-MJ

United States District Court  
Southern District of Texas  
FILED

AUG 17 2017

1 Gonzalo ANDRADE-Cano )  
2 Rene AMARO-Garcia )  
3 Damaris SAENZ )

Defendant(s)

## CRIMINAL COMPLAINT

David J. Bradley, Clerk of Court

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 8/16/2017 in the county of Cameron in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 U.S.C. 841(a)(1) and  
21 U.S.C. 846

Knowingly and intentionally possess with  
the intent to distribute approx. 294.61  
kgs of marijuana, schedule I controlled  
substance; and conspiracy to possess  
with intent to distribute the approx.  
294.61 kgs of marijuana.

This criminal complaint is based on these facts:

"SEE ATTACHMENT A"

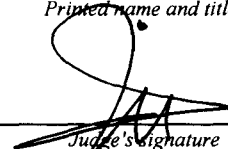
☒ Continued on the attached sheet.


Complainant's signature

Jonathan Green, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 8/17/2017City and state: Brownsville, Texas


Judge's signature

Ignacio Torteya U.S. Magistrate Judge

Printed name and title

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United States  
VGonzalo ANDRADE-Cano  
Rene AMARO-Garcia  
Damaris SAENZUnited States District Court  
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ATTACHMENT A  
(AFFIDAVIT)

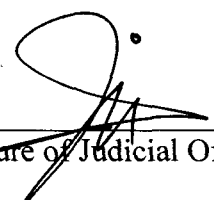
On August 16, 2017, United States Border Patrol (BP) observed a low flying aircraft flying into the United States from Mexico. A few minutes later BP observed the aircraft flying back to Mexico. BP responded to the last known location of the aircraft and observed numerous vehicles in the area. At that time, Agents observed an individual, who was later identified as Damaris SAENZ, run from a white in color truck and a few minutes later SAENZ was apprehended. At that time, the vehicles departed the area. As other BP agents arrived, a white in color vehicle, matching the description of the aforementioned white vehicle and a gold in color vehicle was observed arriving at a residence. The driver of the white vehicle, who was wearing a red in color t-shirt and blue jean shorts, whom was later identified as (Rene Efren AMARO-Garcia) run from the white vehicle and absconded into the brush behind the residence. BP later located AMARO-Garcia approximately 50 feet from the vehicle. BP observed two bundles of what appeared to be narcotics left behind in the white vehicle.

The driver of the gold in color vehicle, who was identified as Gonzalo ANDRADE-Cano, stated that he was the owner of the residence and that he had no connection to the white vehicle or its occupants. When interviewed by BP Agents it was determined that ANDRADE-Cano was found to be in the United States illegally.

All three subjects and the suspected narcotics were transported back to the Harlingen Border Patrol Station. At the Harlingen Station the bundles were tested positive for the presence of marijuana. During a post-arrest interview, all three subjects were advised of their Miranda Rights. ANDRADE-Cano freely admitted to being financially compensated for his participation in this particular illegal narcotics smuggling attempt. In addition, AMARO-Garcia freely admitted to being financially compensated by SAENZ for his participation in this particular illegal narcotics smuggling attempt.

  
\_\_\_\_\_  
Signature of Complainant

Sworn to before me, and subscribed in my presence,

August 17, 2017 at Brownsville, TX  
Date City and StateU.S. Magistrate Judge Ignacio Torteya, III  
Name and Title of Judicial Officer  
\_\_\_\_\_  
Signature of Judicial Officer